

**TECHNICAL REVIEW DOCUMENT**  
**for**  
**RENEWAL OF OPERATING PERMIT 95OPRB036**  
to be issued to:

Northwest Pipeline Corporation  
Rangely Compressor Station  
Rio Blanco County  
Source ID 1030021

Prepared by Geoffrey D. Drissel  
April 18, 2007

**I. Purpose:**

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewal operating permit proposed for this site. The original Operating Permit was issued August 1, 1997. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted April 3, 2007, previous inspection reports and various e-mail correspondence, as well as telephone conversations with the applicant. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

**II. Source Description:**

This source is classified as a natural gas compression facility defined under Standard Industrial Classification 4922. Gas is compressed to specification for transmission to sales pipelines using four Internal Combustion Engines to power compressor units. A backup generator, having actual emissions below de

minimis levels, also exists on site. Based on the information available to the Division and provided by the applicant, it appears that no modifications to these significant emission units have occurred since the original issuance of the operating permit.

Each of the compressor engines was installed and began operation in 1956, and each is therefore grandfathered from Colorado construction permitting requirements per Regulation No. 3, Part B, Section I.A. Consequently, the only specific applicable requirements for each engine are a 20% opacity limitation and APEN reporting in accordance with Regulation No. 3, Part A.II.

Note that none of the emission units are equipped with control devices and therefore the Compliance Assurance Monitoring (CAM) requirements do not apply to any of the emission units at this facility.

The facility is located in a rural area near the town of Rangely in Rio Blanco County, Colorado, in an area designated as attainment for all criteria pollutants. Utah is designated as an affected state located within a 50 mile radius of the facility. Dinosaur National Monument is a Colorado Category I designated area located within 100 kilometers of the plant. This facility has facility-wide potential and actual emissions as follows:

| <u>Pollutant</u> | <u>Potential to Emit (tpy)</u> | <u>Actual (tpy)</u> |
|------------------|--------------------------------|---------------------|
| NOx              | 1400.0                         | 370.7               |
| VOC              | 42.8                           | 11.3                |
| CO               | 197.0                          | 52.2                |

This source is considered to be a major stationary source in an attainment area (Potential to Emit > 250 Tons/Year) and is considered major for purposes of Prevention of Significant Deterioration (PSD) regulations. Modifications to this facility have not yet triggered significance levels that would result in PSD review. Subsequent modifications to this facility that are in excess of significance levels as defined in Colorado Regulation No. 3, Part D, Section II, A.42, would result in the application of PSD regulations.

Potential and actual emissions are taken from a revised APEN submitted with the 4/3/07 renewal application, corrected to reflect the use of emission factors shown in the current Operating Permit and the actual fuel rate of the four engines. The Division assumes that emissions from the facility have remained the same or decreased from the levels listed on this revised APEN. This facility is not a major source of HAPs and, consequently, it is not subject to either Subpart HH or Subpart HHH of the National Emission Standards for Hazardous Air Pollutants.

### III. Discussion of Modifications Made

#### Source Requested Modifications

The source did not request any changes to the permit in their renewal application other than a change in the responsible official.

#### Other Modifications

Although the source did not request any changes to their permit in their renewal application, the Division has included changes to make the permit more consistent with recently issued permits, including comments made by EPA on other Operating Permits, as well as to correct errors or omissions identified during review of this renewal. These changes are as follows:

#### Section I - General Activities and Summary

- The language in Condition 1.4 was changed to include General Conditions 3d and 3g (last paragraph) to the list of State-only enforceable conditions.
- The language in Condition 3.1 was revised based on comments made by EPA and to reflect changes to the Colorado Regulation citations.

#### Section II - Specific Permit Terms

##### Section II.1.3: Opacity compliance language

- The language regarding the presumption of compliance with the opacity standard if natural gas is used as fuel was updated to reflect the current version.

#### Section III – Permit Shield

- The citation at the beginning of Section III was updated.

#### Section IV - General Conditions

- The General Conditions were updated to reflect the most current version,

including Conditions 3, 21 and 22.

#### Appendices

- Appendix B and C were replaced with revised Appendices.
- The EPA addresses in Appendix D were corrected.